

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address NEXUS BANKRUPTCY BENJAMIN HESTON (297798) 3090 Bristol Street #400 Costa Mesa, CA 92626 Tel: 949.312.1377 Fax: 949.288.2054 ben@nexusbk.com <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Debtor	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - RIVERSIDE DIVISION DIVISION	
In re: RAUL RAMIREZ Debtor(s).	CASE NO.: 6:24-bk-15947-RB CHAPTER: 7 MOTION IN A CHAPTER 7 OR 13 CASE (1) TO REOPEN CASE AND (2) FOR EXTENSION OF TIME TO FILE FORMS REQUIRED FOR DISCHARGE [LBR 5010-1; 9013-1(q)(11)]

1. Bankruptcy Case Information:

- a. A petition under chapter ☒ 7 ☐ 13 was filed on (date) 10/03/2024.
- b. The court closed this case without entering a discharge because the Debtor failed to timely file one or both of the following form(s) required for a discharge to be entered (Required Form(s)):

Chapter 7 or 13 Cases: [11 U.S.C. § 727(a)(11); LBR 3015-1(t)]

☒ Official Form 423, Certification About a Financial Management Course

Chapter 13 Cases: [11 U.S.C. § 1328(g)(1), LBR 3015-1(t)]

☐ Debtor's Certification of Compliance Under 11 U.S.C. § 1328(a) and Application for Entry of Discharge

2. Motion

- a. The Debtor(s) request that the court enter an order: (a) reopening the case pursuant to 11 U.S.C. § 350(b) and FRBP 5010; and (b) extending the time to file the Required Form(s) for a period of 30 days from the date of entry of an order granting this motion.

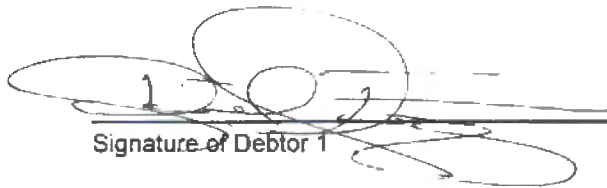
- b. The Debtor(s) failed to file the Required Form(s) by the original deadline, and therefore need to have the case reopened so that the Required Form(s) can be filed and a discharge can be entered because *(explain circumstances that prevented the Debtor from filing Required Form(s) in a timely manner)*:

I am the debtor in this bankruptcy case and have personal knowledge of the facts stated in this declaration. I filed for bankruptcy on October 3, 2024 and completed the required financial management course on October 17, 2024 through DebtorEdu. At the time, I believed that the course provider would file the completion certificate with the court on my behalf. My attorney believed that the course provider would file the certificate automatically. We later discovered that the certificate had not been filed, which resulted in my case being closed without a discharge. The financial management certificate is attached to this motion and I respectfully request that the court reopen my case so I can submit the financial management course certificate and receive my discharge.

3. Declaration

I declare under penalty of perjury that the foregoing is true and correct.

Date: 02/05/2025



Signature of Debtor 1

Raul Ramirez

Printed name of Debtor 1

Date: 02/05/2025

/s/Benjamin Heston

Signature of Attorney for Debtor

Benjamin Heston

Printed name of Attorney for Debtor

Certificate Number: 14912-CAC-DE-038974724

Bankruptcy Case Number: 24-15947



14912-CAC-DE-038974724

CERTIFICATE OF DEBTOR EDUCATION

I CERTIFY that on October 17, 2024, at 1:00 o'clock PM EDT, Raul Ramirez completed a course on personal financial management given by internet by 001 Debtoredu LLC, a provider approved pursuant to 11 U.S.C. 111 to provide an instructional course concerning personal financial management in the Central District of California.

Date: October 17, 2024 By: /s/Jai Bhatt

Name: Jai Bhatt

Title: Counselor

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

A true and correct copy of the foregoing document entitled: **MOTION IN A CHAPTER 7 OR 13 CASE (1) TO REOPEN CASE AND (2) FOR EXTENSION OF TIME TO FILE FORMS REQUIRED FOR DISCHARGE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 2/5/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Larry D Simons (TR) larry@janus.law,
c119@ecfcbis.com;nancy@lsimonslaw.com;simonsecf@gmail.com;keila@janus.law
United States Trustee (RS) ustpreion16.rs.ecf@usdoj.gov
Jennifer C Wong bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

2/5/2025
Date

Benjamin Heston
Printed Name

/s/Benjamin Heston
Signature